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Attorney for
GGW GLOBAL BRANDS, INC.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re
GGW BRANDS, LLC *et al.*
Debtors.

WYNN LAS VEGAS LLC dba WYNN LAW
VEGAS, a Nevada limited liability company

Plaintiff, Counterclaim
Defendant

v.

GGW DIRECT, LLC, a Delaware limited
liability company; GGW BRANDS, LLC, a
Delaware limited liability company; GGW
EVENTS, LLC, a Delaware limited liability
company; MANTRA FILMS, INC., a
suspended Oklahoma corporation; BLUE
HORSE TRADING, LLC, a California limited
liability company; PEPE BUS, LLC, an
inactive Montana limited liability company;
SANDS MEDIA, INC., a revoked Nevada
domestic corporation; JOSEPH R. FRANCIS,
an individual; DAVID R. HOUSTON, an
individual; and DAVID R. HOUSTON, LTD.,
a Nevada professional corporation, doing
business as THE LAW OFFICE OF DAVID
R. HOUSTON,

Defendants

Caption continued

Adv Proc.: 13-01050-MMN

Chapter 11

GGW GLOBAL BRANDS, INC.
OPPOSITION TO MOTION FOR ORDER
APPROVING STIPULATION REGARDING
RESOLUTION OF REMOVED ACTION

Hearing:

Date: August 28, 2013

Time: 9:30 a.m.

Place: Courtroom 2

US Bankruptcy Court
District of Nevada
Foley Federal Building
300 Las Vegas Boulevard South
Las Vegas, NV 989101

1 GGW GLOBAL BRANDS, INC., as successor
2 in interest of certain assets of PEPE BUS, LLC

3 Counterclaimant and
4 Crossclaimant

5 v.

6 WYNN LAS VEGAS LLC d/b/a WYNN LAS
7 VEGAS

8 Counterclaim Defendant

9 -and-

10 GGW DIRECT, LLC; GGW BRANDS, LLC;
11 and GGW EVENTS, LLC

12 Crossclaim Defendants

13 GGW GLOBAL BRANDS, INC., as successor in interest of certain assets of PEPE BUS,
14 LLC, hereby files the following Opposition to the Motion for Order Approving Stipulation
15 Regarding Resolution of Removed Action (Docket No. 23):

16 **I. SUMMARY OF PROCEEDINGS**

17 GGW GLOBAL BRANDS, INC. incorporates by reference the Procedural Background
18 contained with the Motion for Order Approving Stipulation Regarding Resolution of Removed
19 Action (Docket No. 23).

20 PEPE BUS, LLC, although a named Defendant in the underlying action, was never served
21 with a Summons or a copy of the Complaint. GGW GLOBAL BRANDS, INC., by operation of an
22 Assignment from PEPE BUS, LLC, is successor in interest to PEPE BUS, LLC with respect to the
23 funds in the trust account of HOUSTON which are at issue in the underlying litigation.

24 Concurrently with the filing of this Opposition, GGW GLOBAL BRANDS, INC. has filed
25 an Answer, Counterclaim and Crossclaim in the underlying litigation in which it makes claim to
26 all funds in the trust account of HOUSTON which are at issue in the underlying litigation.

II. ARGUMENT

As part of the proposed Resolution of Removed Action which this court has been asked to approve, WYNN LAS VEGAS, GGW DIRECT, LLC, GGW BRANDS, LLC and GGW EVENTS, LLC are agreeing to a division and distribution among them of the funds held in the HOUSTON trust fund account.

GGW GLOBAL BRANDS, INC., which has filed claims to those funds as part of its Answer, Counterclaim and Crosscomplaint has not agreed to such division of its funds and does not agree to such division.

It is axiomatic, that less than all of the parties to litigation cannot settle the litigation by agreeing to divide up amongst themselves funds to which another party to the litigation has an active claim pending in the litigation.

III. CONCLUSION

This Court must deny the Motion for Resolution of Removed Action to the extent that it seeks to divide the funds contained in the HOUSTON trust account as the claims of GGW GLOBAL BRANDS, INC. to those funds have not yet been adjudicated and GGW GLOBAL BRANDS, INC. has not agreed to the proposed settlement.

DATED: August 14, 2013

By: /S/ KENNETH E. LYON, III

Attorney for GGW GLOBAL BRANDS, INC.

CERTIFICATE OF SERVICE

1. On August 14 and on August 15, 2013 I served the following document:

GGW GLOBAL BRANDS, INC. OPPOSITION TO MOTION FOR ORDER
APPROVING STIPULATION REGARDING RESOLUTION OF REMOVED
ACTION

2. I served the above-named document by the following means to the persons listed
below:

X ☐ ECF System

X ☐ United States mail, postage fully prepaid

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I declare under penalty of perjury the foregoing is correct and true.

/s/ Kenneth E. Lyon, III